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 U.S. DISTRICT COURT
 N.D. OF ALABAMA

CR00-S-422-S Superceding

intends to introduce into evidence or mention during either the guilt or sentencing phase of trial.

4. Permit defendant to inspect and copy or photograph all results or reports of examinations, tests, and experiments as provided in the Federal Rules of Criminal Procedure, Rule 16(a)(1)(D).

5. Provide defendant with all exculpatory or otherwise favorable information as provided in Brady v. Maryland , 373 U.S. 83 (1963) and its progeny.

6. Furnish defendant with a copy of all statements of government witnesses as provided in 18 U.S.C. 3500.

7. Defendant requests that the government comply with both the letter and the spirit of Rule 16 as well as the constitutional requirements for the production and disclosure of exculpatory and impeaching information.

8. This is Defendant's first motion for production. While it is general in nature, it embraces all the requirements of Rule 16, and is made in an effort to expedite the discovery process. Defendant respectfully requests that this Court will grant defendant leave to file an additional and more specific motion(s) for discovery if and when the need arises. With these conditions, Defendant respectfully prays that this Court will order the production of the foregoing materials.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT
ERIC ROBERT RUDOLPH

CERTIFICATE OF SERVICE

I hereby certify that on this the 3rd day of October 2003, a copy of the foregoing was served upon the following by hand delivery.

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